

REMARKS/ARGUMENTS

Upon entry of the above amendment, claims 12-24 will not have been amended. In view of the above, Applicant respectfully requests reconsideration of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicant would like to express his appreciation to the Examiner for the detailed Official Action provided.

Additionally, Applicant hereby makes of record a telephone interview with the Examiner on November 10, 2003 as a result of which the Examiner agreed to withdraw the finality of the previous Official Action. The Examiner is thanked for his consideration and cooperation.

Turning to the merits of the action, the Examiner has rejected claims 12-24 under 35 U.S.C § 103(a) as being unpatentable by AKATSU et al (U.S. Patent 6,496,862) in view of LO et al. (U.S. Patent 6,324,178).

As noted above, claims 12-24 remain pending. Applicant respectfully traverses the above rejection based on pending claims 12-24 and will discuss said rejection with respect to the pending claims in the present application as will be set forth herein below.

Applicant's claims relate to a gateway apparatus at a transmitting side of a system that receives data from a transmitting apparatus that does not have an IP address, configures the data for Internet transmission, generates an Internet-frame based on the

data and an IP address which is assigned to a receiving apparatus. The IP address assigned to the receiving apparatus is input by an input device.

Applicant's claims also relate to a gateway apparatus at a receiving side of a system that receives an Internet-frame including an IP address corresponding to a receiving apparatus that does not have an IP address and data from the transmitting apparatus, searches the memory for the receiving apparatus not having the IP address to which the data is to be transferred, based on the IP address included in the Internet-frame, and transfers the data to the receiving apparatus not having the IP address.

On the contrary, AKATSU et al. discloses a gateway apparatus that transforms a format of data in an external network into a format of data in an internal network. However, AKATSU et al. does not disclose how a transmitting apparatus not having an IP address such as, e.g., a scanner, inputs the IP address assigned to the receiving apparatus, when the transmitting apparatus that does not have the IP address sends an Internet-frame to the receiving apparatus. In other word, the present invention solves at least two problems. One problem is that when a data format of a transmitting apparatus is different form a data format of a receiving apparatus, the receiving apparatus cannot receive the data. Another problem is that a transmitting apparatus that does not have an IP address, such as, e.g., a scanner, cannot input the IP address of the receiving apparatus by itself, when the transmitting apparatus that does not have the IP address sends an Internet-frame to the receiving apparatus. The present invention solves both of these problems.

On the other hand, AKATSU et al. does not disclose a transmitting apparatus not having an IP address which inputs an IP address assigned to a receiving apparatus through an input device, as the Examiner has admitted. That is, AKATSU et al. does not have a feature that would give rise to the second problem. Because an apparatus not having an IP address cannot input an IP address of the receiving apparatus, the controller of the present invention must obtain the IP address in another fashion. In particular, the controller of the present invention obtains the IP address from an input device. This feature of the claimed combination is not shown in AKATSU et al. cited by the Examiner.

Furthermore, the gateway of AKATSU et al. as described at col. 9, lines 2-17 relates to the gateway as a managing node but does not teach an input device that provides an IP address where there is none.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 12-24 are not disclosed in AKATSU et al. recited by the Examiner.

LO et al. discloses a bridge circuit that transfers data between domains of differing data packet format. In particular, the embodiment of LO et al. shows transferring data between a domain compatible with the IEEE 1394 serial communication standard and another domain compatible with the Ethernet IEEE 802.3 ("Ethernet") communication standard. However, LO et al. merely transfers data between different domains, like AKATSU et al. explained above. Thus, LO et al. does not disclose how a transmitting apparatus not having an IP address provides an IP address assigned to the receiving apparatus, when the transmitting apparatus not having the IP address sends an Internet-

frame to the receiving apparatus. In other words, the feature of LO et al. is to transfer data between domains of any communication standards. To transfer data between different formats is merely one problem that the present invention solves, but is not the claimed feature of the present invention. The claimed feature of the present invention includes how an apparatus not having an IP communicates with another apparatus via the Internet by utilizing IP address provided by an input device. However, LO et al. does not disclose that a transmitting apparatus not having an IP address, through an input device, inputs an IP address assigned to a receiving apparatus. Because an apparatus not having an IP address can not input an IP address of the receiving apparatus, an input device, as provided by the present invention, become necessary. This feature of the claimed combination is not shown in LO et al. cited by the Examiner.

Further, LO et al. discloses that the domain can be any communication standard (col. 4, lines 52-55). However, this description relates to format of the data being transferred, but not to how a transmitting apparatus not having an IP address communicates with another apparatus via the Internet by utilizing an IP address. Thus, LO et al. also does not disclose the above feature of the claimed invention. The “reformatting of received information ” referenced by the Examiner does not teach providing an IP address.

Therefore, it is respectfully submitted that the features recited in Applicant’s claims 12-24 are not disclosed in LO et al. cited by the Examiner.

The combination of AKATSU et al. and LO et al. is also clearly distinct from the pending claims, since each of AKATSU et al. and LO et al. lacks at least the above features recited in Applicant's claims. Thus, the pending claims are submitted to be patentable over the Examiner's proposed combination. and are not obvious to one of ordinary skill in the art at the time the invention was made.

At the bottom of page 3 of the Official Action, the Examiner admits that both AKATSU et al. and LO et al. do not teach a transmitting apparatus that does not have an IP address. Nevertheless, the Examiner concludes that LO et al.'s supporting of "any communication standard" renders the claimed feature obvious. Applicant respectfully traverses and submits that the obviousness asserted by the Examiner does not flow from the prior art of record. Disclosures that do not deal with devices (i.e., a transmitting apparatus or a receiving apparatus) that do not have an IP address cannot teach how to deal with such devices.

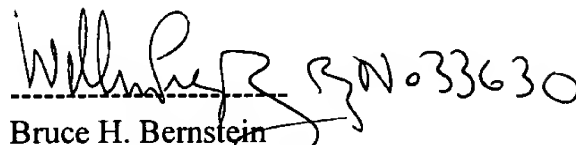
Accordingly, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejection and an indication of the allowability of all the claims pending in the present application in due course.

SUMMARY AND CONCLUSION

Applicant has made a sincere effort to place the present application in condition for allowance and believes that he has now done so. Applicant has pointed out the claimed features and has contrasted the features of the claims with the disclosures of the references. Accordingly, Applicant has provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully requests an indication of the allowability of all the claims pending in the present application in due course.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
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